

 <b>BROWN</b> Alpert Medical School	<b>Medical Student          Academic Support,          Career Advising, and          Educational Records</b>	<b>POLICY NO.: 11-05</b>
		Effective Date: July 1, 2019

**1.0 Policy Purpose**

The purpose of this policy is to govern effective academic support and career advising and to protect educational records for medical students of the Warren Alpert Medical School of Brown University (AMS). This policy relates to the following:

- Confidentiality of Student Educational Records (Element 5)

Such policy is in place to ensure compliance with Liaison Committee on Medical Education (LCME) requirements for re-accreditation and correspond to elements of Standard 11 (Medical Student Academic Support, Career Advising, and Educational Records).

**2.0 To Whom the Policy Applies**

All AMS community members.

**3.0 Policy Statement**

**3.1 Confidentiality of Student Educational Records**

Faculty/Administration Access to Medical Student’s File

Brown University’s policies pertaining to student access to records and the protection of confidentiality comply with the Family Educational Rights and Privacy Act of 1974 (FERPA). Students may view the information contained in their own EMSR at any time.

Documents containing information of a highly confidential nature will not be uploaded to EMSR, but instead will be kept in a confidential file in the Senior Associate Dean’s office. If a confidential file is being kept, a flag in EMSR will indicate that additional information is on file in the Senior Associate Dean’s office. Students have the right to review all information contained in their own confidential file.

Within the medical school, only those members acting in the students’ educational interests are allowed access to EMSR and OASIS. No one outside the medical school can have access to EMSR nor will the medical school disclose FERPA-protected information from the students’ educational records without the written consent of students, except to personnel within the institution, officials of other institutions in which the students seek to enroll, persons or organizations providing students financial aid, accrediting agencies carrying out their accreditation function, persons in compliance with a judicial order or, in an emergency, to persons charged with protecting the health or safety of students or other persons.

### Medical Student Access to Records

Students who believe that an assigned grade, evaluation, or other part of their educational record is not an accurate reflection of their performance should discuss this with the Dean(s) or Director(s) of the Curriculum for the appropriate year and the Course Leader(s), Clerkship Director(s), Sub-internship Directors, or Clinical Elective Directors as a first discussion. If students wish to appeal their grade, evaluation, or record beyond this first step, they may submit their appeal to the Grades and Records Appeal Committee, a subcommittee of MCASP. This committee will hear a student's appeal and offer final judgment on whether a grade, evaluation, or record change is warranted. The decision of this committee is final.

Students have a right to expect that faculty and staff will respect their privacy and deal with sensitive information in an appropriate and professional manner. Information on an individual student's grades, performance on external examinations (e.g., USMLE), financial status, medical issues, personal problems, and similar sensitive information is handled carefully to prevent it from becoming known to unauthorized individuals.

The staff is mindful of standards of professional conduct designed to keep sensitive personal information confidential. This includes keeping confidential information secure, limiting access to student information systems, shredding rather than throwing away sensitive documents, not leaving sensitive information exposed on computers, and not discussing sensitive information when unauthorized persons are present.

*(Brown University FERPA Policy re: release of records without consent):* Disclosures to University officials with legitimate educational interests. A University official is a person employed by the University in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the University has contracted (such as an attorney, auditor, or collection agent); a person serving on the Corporation; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another University official in performing their tasks. A University official has a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibility.

<https://www.brown.edu/about/administration/registrar/student-information-rightsferpa>

## 4.0 Definitions

For the purpose of this policy, the terms below have the following definitions:

- 4.1 **AMS:** The Warren Alpert Medical School of Brown University
- 4.2 **COLE:** Committee on the Learning Environment. This committee affirms the medical school's commitment to shaping a culture of teaching and learning that is rooted in respect for all.
- 4.3 **EMSR:** Electronic Medical Student Record is a secure online system for storing information about AMS students, and is maintained by AMS Office of Records and Registration.
- 4.4 **FERPA:** The Family Educational Rights and Privacy Act of 1974 is a United States federal law that governs the access to educational information and records by public entities such as potential employers, publicly funded educational institutions, and foreign governments.

- 4.5 **MCC:** The Medical Curriculum Committee oversees the review of curricular content and integration, and evaluation of the medical education program to ensure continuous oversight of such program. (Formerly “MDCC.”)
- 4.6 **OASIS:** Registration and evaluation system designed specifically for medical student information into which student evaluations and grades are submitted electronically.
- 4.7 **USMLE:** United States Medical Licensing Examination is a three-step examination for medical licensure in the United States.

## 5.0 **Responsibilities**

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

Responsibilities include the department/office of the subcommittee responsible for the Standard; for Standard 11, this is primarily the Offices of Student Affairs, Diversity and Multicultural Affairs, and Records and Registration.

## 6.0 **Consequences for Violating this Policy**

Failure to comply with this and related policies is subject to disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.

Brown’s Ethics and Compliance Reporting System allows anonymous and confidential reporting on matters of concern, including privacy issues, through the EthicsPoint platform.

Failure to comply with this policy will be referred to either the COLE executive committee or the Medical Curriculum Committee.

## 7.0 **Related Information**

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

### 7.1 **Related Forms:**

- Data Collection Instrument for Standard 11: Medical Student Academic Support, Career Advising, and Educational Records, as submitted to the LCME in July 2020.

### 7.2 **Other Related information:**

- **LCME Standard 11: Medical Student Academic Support, Career Advising, and Educational Records.** A medical school provides effective academic support and career advising to all medical students to assist them in achieving their career goals and the school’s medical education program objectives. All medical students have the same rights and receive comparable services.
  - Standard 11, Element 5: Confidentiality of Student Educational Records. At a medical school, medical student educational records are confidential and available only to those

members of the faculty and administration with a need to know, unless released by the student or as otherwise governed by laws concerning confidentiality.

- Brown University FERPA Policy  
<https://www.brown.edu/about/administration/registrar/student-information-rightsferpa>

## 8.0 Policy Owner and Contact(s)

- 8.1 **Policy Owners:** Subcommittee Standard Offices related to this policy: Offices of Student Affairs, Diversity and Multicultural Affairs, and Records and Registration.
- 8.2 **Policy Approved by:** Medical Curriculum Committee
- 8.3 **Subject Matter Contact:** Same as 8.1.

## 9.0 Policy History

- 9.1 **Policy Effective Date:** July 1, 2019
- 9.2 **Policy Last Reviewed:** March 2020 by MCC In June 2021, all policies herein were reviewed and revised against the Student Handbook and any inconsistencies were corrected. The policies in the Student Handbook were removed in full and instead will be linked to this policy as appropriate.
- 9.3 **Policy Update/Review Summary:** This policy was approved on March 18, 2020, by the MCC. Formatted to comply with new University Policy template. Added avenue for student to correct educational record to policy from Student Handbook to make the policy current.

**Key Words:** confidentiality, educational record, FERPA, EMSR, OASIS